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VIA HAND DELIVERY

The Honorable William G. Young
Chief Judge, United States District Court
District of Massachusetts
One Courthouse Way
Boston, MA 02210

RE: Coverall North America, Inc. v. Padilha, No. 05-11867 (MLW)
Coverall North America, Inc. v. Lisboa, No. 05-11868 (RWZ)
Coverall North America, Inc. v. Canestraro, No. 05-11869 (WGY)
Coverall North America, Inc. v. Martins, No. 05-11870 (MLW)
Coverall North America, Inc. v. Pereira, No. 05-11871 (RCL)
Coverall North America, Inc. v. Furtado, No. 05-11872 (RGS)
Coverall North America, Inc. v. De Carvalho, No. 05-11873 (MLW)
Coverall North America, Inc. v. Sodre, No. 05-11874 (MLW)
Machado et al. v. Coverall North America, Inc., No. 05-11884 (RGS)

Dear Chief Judge Young:

I am writing to you in your capacity as Chief Judge to bring to your attention the filing of the above-referenced nine related lawsuits. I represent a group of more than ten non-English speaking immigrant janitorial workers who have claims that they seek to

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bring on a classwide basis against Coverall North America, Inc. ("Coverall"). These claims include wage claims, misrepresentation, misclassification of the workers as independent contractors, unfair and deceptive business practices, breach of contract, and others.

Knowing that these workers were preparing to file a class action lawsuit in which they would seek a ruling invalidating Coverall's mandatory arbitration policy, Coverall took the preemptive step of filing eight separate lawsuits against a number of these workers, seeking orders compelling them to arbitrate their claims. Thus, there are now eight separate lawsuits pending on this same issue before five different judges and an additional lawsuit filed by the workers against Coverall. I am enclosing a copy of the workers' class action complaint and one of the eight virtually identical complaints filed by Coverall against the workers.

It appears that these cases should all be consolidated. I am bringing this to your attention so as not to take up the time of five different judges to address this issue.

Thank you for your attention to this matter.

Sincerely,



Shannon Liss-Riordan

cc: Michael Vhay, Esq.